

700 Louisiana Street, Suite, 14104E

Houston, TX 77002-2700

Phone: 832-320-5880

shrishti_chhabra@transcanada.com

December 17, 2018

Mr. William F. Durham, Director WVDEP - Division of Air Quality 601 57th Street SE Charleston, West Virginia 25304

RE: Title V Permit Application

Columbia Gas Transmission, LLC

Lone Oak Compressor Station (Facility ID #: 051-00216)



Dear Mr. Durham,

Attached is an initial Title V permit application for Columbia Gas Transmission's (Columbia) Lone Oak Compressor Station, which is located in Marshall County, West Virginia. The Station was issued Permit to Construct R13-3254A on December 12, 2017. In accordance with 45 CSR 30, this application is being submitted within 12 months after commencing operation.

This package contains the general application forms along with all required attachments for an initial Title V permit application. Per WVDAQ, there is no application fee associated with this application.

The Station's potential to emit (PTE) exceeds 100 tons per year for nitrogen oxides and carbon monoxide; therefore, the Station is considered a Title V source for permitting purposes. The Station's PTE does not exceed Prevention of Significant Deterioration (PSD) applicability thresholds; therefore, the Station is not considered a major PSD source.

Should you have any questions or need additional information, please feel free to contact me at (832) 320 5880 or via email at shrishti chhabra@transcanada.com.

Sincerely,

Shrishti Chhabra

Principal Environmental Engineer

Lunda PRO

Attachments

APPLICATION FOR 45 CSR 30 PERMIT TO OPERATE

Columbia Gas Transmission, LLC Lone Oak Compressor Station Marshall County, West Virginia

December 2018

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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street SE Charleston, WV 25304 Phone: (304) 926-0475

www.dep.wv.gov/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

Section 1. General Information		
1. Name of Applicant (As registered with the WV Secretary of State's Office):	2. Facility Name or Location: Lone Oak Compressor Station	
Columbia Gas	Bone our compressor station	
3. DAQ Plant ID No.:	4. Federal Employer ID No. (FEIN):	
0 5 1 — 0 0 2 1 6	3 1 0 8 0 2 4 3 5	
5. Permit Application Type:		
	perations commence? MM/DD/YYYY expiration date of the existing permit? MM/DD/YYYY	
	7 To the Applicant that	
5. Type of Business Entity: 7. Is the Applicant the:		
☐ Corporation ☐ Governmental Agency ☒ LLC ☐ Partnership ☐ Limited Partnership	Owner Operator Both	
Number of onsite employees: If the Applicant is not both the owner and operator please provide the name and address of the other party.		
3		
9. Governmental Code:		
Privately owned and operated; 0	County government owned and operated; 3	
Federally owned and operated; 1 Municipality government owned and operated; 4		
☐ State government owned and operated; 2 ☐	District government owned and operated; 5	
10. Business Confidentiality Claims		
Does this application include confidential informatio	n (per 45CSR31)? Yes No	
If yes, identify each segment of information on each justification for each segment claimed confidential, it accordance with the DAQ's "PRECAUTIONARY NO		

Page	of	
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11. Mailing Address				
Street or P.O. Box: 1700 MacCorkle	Ave, SE			
City: Charleston		State: WV		Zip: 25314-
Telephone Number: (304) 357-2000	Telephone Number: (304) 357-2000 Fax Number: ()) -	
12. Facility Location				
Street: Waynesburg Pike	City: Lone Oak		County	: Marshall
UTM Easting: 535.8 km	UTM Northing: 4,414.8 km		Zone:	☑ 17 or ☐ 18
Directions: From the town of Lone Compressor Station will be on the left	i.	on Waynesburg Pil	ke for approx	rimately 1.7 miles.
Portable Source? Yes	No			
Is facility located within a nonattain	nment area?	Yes 🛭 No	If yes, f	or what air pollutants?
Is facility located within 50 miles of another state? Yes No		If yes, n Ohio Pennsyl	name the affected state(s).	
Is facility located within 100 km of a Class I Area ¹ ? Yes No If no, do emissions impact a Class I Area ¹ ? Yes No		If yes, n	name the area(s).	
¹ Class I areas include Dolly Sods and Otter Face Wilderness Area in Virginia.	Creek Wilderness Ai	reas in West Virginia, an	d Shenandoah 1	Vational Park and James River

13. Contact Information		
Responsible Official: Tracy A. Sparks		Title: Manager of Operations
Street or P.O. Box: 301 Maple Street		
City: Sugar Grove	State: OH	Zip: 43155-
Telephone Number: (740) 746-2252	Fax Number: () -	
E-mail address: tracy_sparks@transcanada.co	m	
Environmental Contact: Shrishti Chhabra	Title: Principal Env. Engineer	
Street or P.O. Box: 700 Louisiana Street, Suite	14104E	
City: Houston	State: TX	Zip: 77002-2700
Telephone Number: (832) 320-5880	Fax Number: () -	
E-mail address: shrishti_chhabra@transcanada	.com	
Application Preparer: Jennifer Ehrhardt		
Company: AECOM		
Street or P.O. Box: 510 Carnegie Center		
City: Princeton	State: NJ	Zip: 08540-
Telephone Number: (609) 720-2094	Fax Number: () -	
E-mail address: jennifer.ehrhardt@aecom.com		

List all processes, products, NAICS an process, products, NAICS and SIC cod those listed for normal operation.	d SIC codes for normal operation, in order les associated with any alternative operating	of priority. Also list g scenarios if differen	any at from
Process	Products	NAICS	SIC
Natural Gas Transmission		486210	4922
Natural Gas Compressor Station			
15. Provide an Area Map showing p	lant location as ATTACHMENT A.		
16. Provide a Plot Plan(s), e.g. scaled the stationary source(s) is located	d map(s) and/or sketch(es) showing the local as ATTACHMENT B. For instructions,	ation of the property or refer to "Plot Plan - C	on which Guidelines."
	Diagram(s) showing each process or emis d show all emission units, control equipme		

14. Facility Description

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
□ SIP	☐ FIP
☐ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR34)	Nonattainment NSR (45CSR19)
⊠ Section 111 NSPS	Section 112(d) MACT standards
Section 112(g) Case-by-case MACT	☐ 112(r) RMP
Section 112(i) Early reduction of HAP	Consumer/commercial prod. reqts., section 183(e)
Section 129 Standards/Reqts.	Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
NAAQS, increments or visibility (temp. sources)	45CSR27 State enforceable only rule
45CSR4 State enforceable only rule	Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	Compliance Assurance Monitoring (40CFR64)
☐ CAIR NO _x Annual Trading Program (45CSR39)	CAIR NO _x Ozone Season Trading Program (45CSR40)
☐ CAIR SO ₂ Trading Program (45CSR41)	
19. Non Applicability Determinations	
List all requirements which the source has determined requested. The listing shall also include the rule citatio 40 CFR 60 Subpart Dc - The proposed heaters are less that 60.40c(a). 40 CFR 60 Subpart OOOO - The proposed units are not af	on and the reason why the shield applies. In the 10 MMBtu/hr applicability threshold in 40 CFR
Permit Shield	

19. Non Applicability Determinations (Continued) - Attach additional pages as necessary.
List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.
Permit Shield

20. Facility-Wide Applicable Requirements
List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). 1) R13-3254A Condition 3.1.4: Do not discharge air pollutants which cause or contribute to an objectionable odor. [45CSR§4-3.1]
2) R13-3254A Condition 3.3: Conduct stack tests as required. [45CSR13]
3) Facility-wide recordkeeping requirements
4) Facility-wide reporting requirements
Permit Shield
For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
 R13-3254A Condition 3.4.2: Maintain records of all odor complaints received, any investigation performed in response to such a complaint, and any responsive actions taken. [45CSR4]
 R13-3254A Condition 3.3: Submit a protocol 30 days prior to testing and submit a report of all stack test results within 60 days after test completion. [45CSR13]
 R13-3254A Condition 3.4.1: Maintain records of all information required by the permit for at least five years.
 R13-3254A Condition 3.5.4: Submit a certified emissions statement and pay fees on an annual basis. [45CSR30]
H.
Are you in compliance with all facility-wide applicable requirements? Yes No
If no, complete the Schedule of Compliance Form as ATTACHMENT F.

20. Facility-Wide Applicable Requirements (Continued) - Attach additional pages as necessary.		
List all facility-wide applicable requirements. and/or permit with the condition number.	For each applicable requirement, include the rule citation	
Permit Shield		
reporting which shall be used to demonstrate of include the condition number and/or citation.	isted above, provide monitoring/testing/recordkeeping/compliance. If the method is based on a permit or rule, (Note: Each requirement listed above must have an ce. If there is not already a required method in place, then a	
Are you in compliance with all facility-wide ap	plicable requirements? Yes No	
If no, complete the Schedule of Compliance For	m as ATTACHMENT F.	

Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit (if any)
R13-3254A	12/12/2017	
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Permit Number	Date of Issuance	Permit Condition Number
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Section 3: Facility-Wide Emissions

Criteria i Officialità	Criteria Pollutants Potential Emissions		
Carbon Monoxide (CO)	188.64		
Nitrogen Oxides (NO _X)	127.83		
Lead (Pb)	1.72E-06		
Particulate Matter (PM _{2.5}) ¹	15.16		
Particulate Matter (PM ₁₀) ¹	15.16		
Total Particulate Matter (TSP)	15.16		
Sulfur Dioxide (SO ₂)	1.64		
Volatile Organic Compounds (VOC)	27.55		
Hazardous Air Pollutants ²	Potential Emissions		
Formaldehyde	1.74		
Total HAPs	2.54		
Regulated Pollutants other than Criteria and HAP	Potential Emissions		

 $^{^{1}}PM_{2.5}$ and PM_{10} are components of TSP.

²For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

Section 4: Insignificant Activities

24.	Insign	ificant Activities (Check all that apply)
Х	1.	Air compressors and pneumatically operated equipment, including hand tools.
	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
	3.	Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
	4.	Bathroom/toilet vent emissions.
	5.	Batteries and battery charging stations, except at battery manufacturing plants.
	6.	Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
	7.	Blacksmith forges.
Ш	8.	Boiler water treatment operations, not including cooling towers.
	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
	10.	CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
X	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
	14.	Demineralized water tanks and demineralizer vents.
	15.	Drop hammers or hydraulic presses for forging or metalworking.
	16.	Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
	17.	Emergency (backup) electrical generators at residential locations.
	18.	Emergency road flares.
	19.	Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO _x , SO ₂ , VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units.
		Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:
		<u> </u>

24	Incian	ificant Activities (Check all that apply)					
27.							
	20.	Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.					
		Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:					
	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.					
	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.					
	23.	Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.					
	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.					
	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.					
	26.	Fire suppression systems.					
	27.	Firefighting equipment and the equipment used to train firefighters.					
	28.	Flares used solely to indicate danger to the public.					
- ·	29.	Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.					
	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.					
	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.					
	32.	Humidity chambers.					
	33.	Hydraulic and hydrostatic testing equipment.					
	34.	Indoor or outdoor kerosene heaters.					
	35.	Internal combustion engines used for landscaping purposes.					
	36.	Laser trimmers using dust collection to prevent fugitive emissions.					
	37.	Laundry activities, except for dry-cleaning and steam boilers.					
	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.					
	39.	Oxygen scavenging (de-aeration) of water.					
	40.	Ozone generators.					

24.	Insign	ificant Activities (Check all that apply)
	41.	Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
	42.	Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
	43.	Process water filtration systems and demineralizers.
	44.	Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
	46.	Routing calibration and maintenance of laboratory equipment or other analytical instruments.
	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
	48.	Shock chambers.
	49.	Solar simulators.
	50.	Space heaters operating by direct heat transfer,
	51.	Steam cleaning operations.
	52.	Steam leaks.
	53.	Steam sterilizers.
	54.	Steam vents and safety relief valves.
	55.	Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
	56.	Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
	57.	Such other sources or activities as the Director may determine.
	58.	Tobacco smoking rooms and areas.
	59.	Vents from continuous emissions monitors and other analyzers.

7.	
25.	Equipment Table
	Fill out the Title V Equipment Table and provide it as ATTACHMENT D.
26.	Emission Units
	For each emission unit listed in the Title V Equipment Table, fill out and provide an Emission Unit Form as ATTACHMENT E.
	For each emission unit not in compliance with an applicable requirement, fill out a Schedule of Compliance Form as ATTACHMENT F.
27.	Control Devices
	For each control device listed in the Title V Equipment Table , fill out and provide an Air Pollution Control Device Form as ATTACHMENT G.
	For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the Compliance Assurance Monitoring (CAM) Form(s) for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as ATTACHMENT H.

ection of Certification of Historiaan						
28. Certification of	Truth, Accuracy and Completeness and C	ertification of Compliance				
submitted w	Note: This Certification must be signed by a responsible official. The original, signed in blue ink, must be submitted with the application. Applications without an original signed certification will be considered as incomplete.					
a. Certification of T	Fruth, Accuracy and Completeness					
I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.						
b. Compliance Cert	tification					
undersigned hereby c	ents identified in the Title V Application for we certify that, based on information and belief for identified in this application are in compliance.	ormed after reasonable inquiry, all air				
Responsible official	(type or print)					
Name: Tracy Sparks		Title: Manager of Operations				
Responsible official's signature: Signature: Signature Date: 12-10-18 (Must be signed and dated in blue ink)						
Note: Please check a	all applicable attachments included with the	is permit application:				
	A: Area Map					
	B: Plot Plan(s)					
	C: Process Flow Diagram(s)					
	ΓD: Equipment Table					
	Γ E: Emission Unit Form(s)					
☐ ATTACHMENT	F: Schedule of Compliance Form(s)					
☐ ATTACHMENT	Γ G: Air Pollution Control Device Form(s)					
☐ ATTACHMENT	Γ H: Compliance Assurance Monitoring (CAN	VI) Form(s)				

All of the required forms and additional information can be found and downloaded from, the DEP website at $\underline{www.dep.wv.gov/daq}$, requested by phone (304) 926-0475, and/or obtained through the mail.

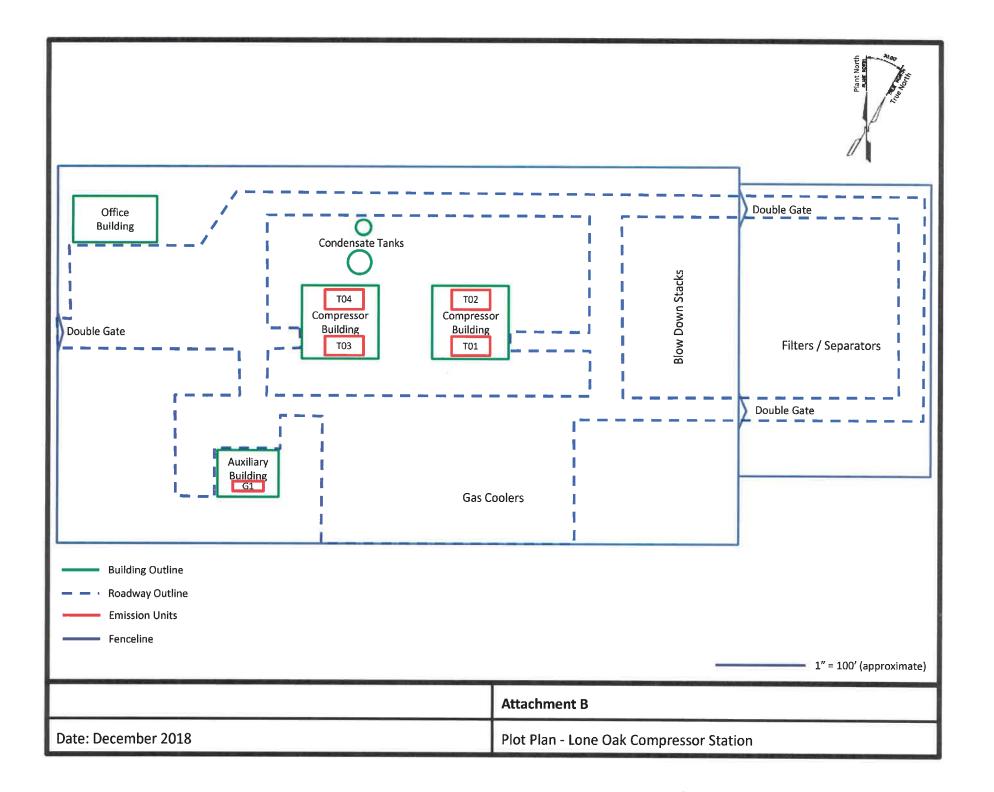
Attachment A Area Map



From the town of Lone Oak, travel south on Waynesburg Pike for approximately 1.7 miles. Compressor Station will be on the left.

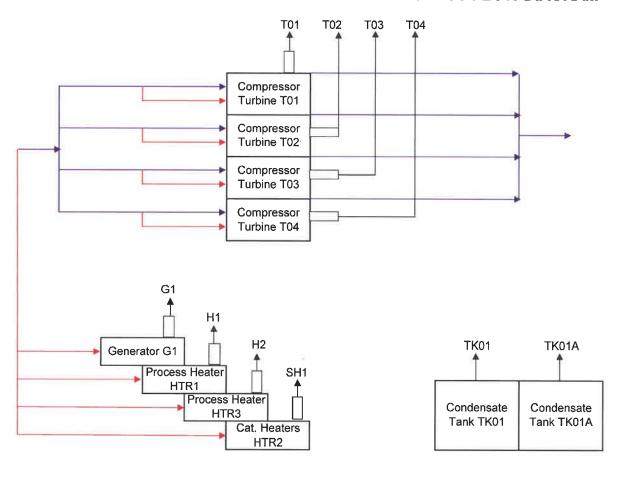
	Attachment A
Date: December 2018	Facility Map Lone Oak Compressor Station

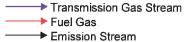
Attachment B Plot Plan



Attachment C Process Flow Diagram

ATTACHMENT C LONE OAK COMPRESSOR STATION PROCESS FLOW DIAGRAM







Attachment D Equipment Table

ATTACHMENT D - Title V Equipment Table (includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/ Modified
T01E	Combustion Controls	T01	Solar Mars 100 Combustion Turbine /Compressor #1	15,339 HP @ 32°F; 16,231 HP @ 0°F	2017
T02E	Combustion Controls	Т02	Solar Mars 100 Combustion Turbine /Compressor #2	15,339 HP @ 32°F; 16,231 HP @ 0°F	2017
T03E	Combustion Controls	Т03	Solar Mars 100 Combustion Turbine /Compressor #3	15,339 HP @ 32°F; 16,231 HP @ 0°F	2017
T04E	Combustion Controls	T04	Solar Mars 100 Combustion Turbine /Compressor #4	15,339 HP @ 32°F; 16,231 HP @ 0°F	2017
H1	None	HTR1	Process Heater #1 (Natural Gas Fired Unit)	0.40 MMBtu/hr	2017
НЗ	None	HTR3	Process Heater #3 (Natural Gas Fired Unit)	0.40 MMBtu/hr	2017
G1	None	G1	Waukesha VGF-P48GL reciprocating, SI, 4SLB engine/generator set (Emergency Generator #1)	1,175 H₽	2017
SH1	None	HTR2	Forty (40) Catalytic Heaters	40 x 0.072 MMBtu/hr	2017
TK01	None	TK01	Condensate (Pipeline Fluids) Storage Tank	1,000 gal	2017
TK01A	None	TK01A	Condensate (Pipeline Fluids) Storage Tank	500 gal	2017

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

	Title V Equipment Table (equipment_table.doc)
	Page 1 of 1
Page <u>1</u> of 1	Revised 4/11/05

Attachment E Emission Unit Forms

ATTACHMENT E - Emission Unit Form					
Emission Unit Description					
Emission unit ID number:	Emission unit name: Turbine #1	List any control devices associated with this emission unit:			
		dry-low-NOx (SoLo	NOx)		
Provide a description of the emission Natural gas-fired Solar Mars 100 Turb		esign parameters, etc.):		
Manufacturer: Solar	Model number: Mars 100-16000S	Serial number:			
Construction date: 12/22/2017 (In service)	Installation date: 12/22/2017 (In service)	Modification date(s): N/A			
Design Capacity (examples: furnace 15,339 HP @ 32°F	s - tons/hr, tanks - gallons):				
Maximum Hourly Throughput: 134,408 scf/hr (Based on 0°F)	Maximum Annual Throughput: 1,115.4 MMscf/yr (Based on 32°F)	Maximum Operating Schedule: 8,760 hr/yr			
Fuel Usage Data (fill out all applicat	ole fields)				
Does this emission unit combust fuel	Does this emission unit combust fuel?Yes _X_ No If yes, is it?				
		Indirect Fired	Direct Fired		
Maximum design heat input and/or maximum horsepower rating: Max Heat Input: 137.10 MMBtu/hr (HHV, 0 °F) 15,339 HP @ 32°F Type and Btu/hr ratin					
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. Natural Gas: 134,408 scf/hr (Based on 0°F); 1,115.4 MMscf/yr (Based on 32°F)					
Describe each fuel expected to be use	ed during the term of the permit.				
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value		
Natural Gas	0.25 grains/100 scf	0	1,020 Btu/scf		

Emissions Data			
Criteria Pollutants	Potential Emissions		
	PPH	TPY	
Carbon Monoxide (CO)	7.53	46.62	
Nitrogen Oxides (NO _X)	7.42	31.24	
Lead (Pb)	-	-	
Particulate Matter (PM _{2.5})	0.90	3.75	
Particulate Matter (PM ₁₀)	0.90	3.75	
Total Particulate Matter (TSP)	0.90	3.75	
Sulfur Dioxide (SO ₂)	7.83	0.41	
Volatile Organic Compounds (VOC)	0.86	3.75	
Hazardous Air Pollutants	Potential Emissions		
	РРН	TPY	
Formaldehyde	0.10	0.40	
Total HAPs	0.14	0.58	
Regulated Pollutants other than	Potential Emissions		
Criteria and HAP	PPH	TPY	
CO2e	16,054	66,609	
		x 3	

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

NOx, VOC, and CO: Vendor Data (20% of UHC for VOC)

CO2e: 40 CFR 98 Subpart C

PM2.5/PM10/TSP: AP-42 Table 3.1-2a (4/00)

SO2: 0.20 grains S/100 scf (hourly); 0.25 grains S/100 scf (annually)

HAPs: AP-42 Table 3.1-3 (4/00)

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
 40 CFR 60 Subpart KKKK, §60.4305(a) – Subject to this subpart since the turbine has a heat input >= 10 MMBtu/hr. R13-3254A Condition 4.1.1.a.i,ii,iv: Annual emission limits (tpy): NOx – 32.82, CO – 48.4, VOC – 3.73 R13-3254A Condition 4.1.1.a.i: NOx limited to 25 ppm at 15% O2 or 150 ng/J of useful output (1.2 lb/MWh). When operating at less than 75% peak load or at temperatures less than 0 °F, the limit for NOx is 150 ppm at 15% O2 or 1,100 ng/J of useful output (8.7 lb/MWh). [40 CFR §60.4320] R13-3254A Condition 4.1.1.a.iii: SO2 limited to 0.060 lb of SO2/MMBtu heat input. [40 CFR §60.4330(a)(2)]
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
(1) R13-3254A Condition 4.5.1: Submit an initial notification within 15 days after start-up. [40 CFR §60.7(a)(3)]
(2) R13-3254A Conditions 4.2.1, 4.4.4: Maintain records of the monthly operating hours for normal, low-load, low-temperature, and startup/shutdown operation. Calculate monthly emissions and keep in a rolling 12-month format.
 (2),(3) R13-3254A Conditions 4.3.1: Conduct an initial performance test for NOx within 60 days after achieving maximum output of the turbine, but no later than 180 days after initial startup. Conduct subsequent performance tests annually. This frequency can be reduced to every two years if the results demonstrate the turbine achieved compliance of <= 75% of the NOx emission limit. Maintain records of performance tests. Submit copy of performance test within 60 days of test completion. [40 CFR §60.8, §60.4340(a), §60.4375(b), §60.4400] (4) R13-3254A Condition 4.4.5: Maintain the fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract specifying that the maximum total sulfur content for natural gas is 20 grains of sulfur or less per 100 scf. [40 CFR §60.4365(a)]

Are you in compliance with all applicable requirements for this emission unit? XYes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form					
Emission Unit Description					
Emission unit ID number:	Emission unit name: Turbine #2	List any control devices associated with this emission unit:			
		dry-low-NOx (SoLo	NOx)		
Provide a description of the emission Natural gas-fired Solar Mars 100 Turb	n unit (type, method of operation, dine #2	esign parameters, etc	:.):		
Manufacturer: Solar	Model number: Mars 100-16000S	Serial number:			
Construction date: 8/22/2018 (In service)	Installation date: 8/22/2018 (In service)	Modification date(s N/A	s):		
Design Capacity (examples: furnace 15,339 HP @ 32°F	s - tons/hr, tanks - gallons):	•			
Maximum Hourly Throughput: 134,408 scf/hr (Based on 0°F)	Maximum Annual Throughput: 1,115.4 MMscf/yr (Based on 32°F)	Maximum Operating Schedule: 8,760 hr/yr			
Fuel Usage Data (fill out all applicab	ole fields)				
Does this emission unit combust fuel	?Yes _X No	If yes, is it? Indirect Fired Direct Fired			
Maximum design heat input and/or Max Heat Input: 137.10 MMBtu/hr (H 15,339 HP @ 32°F	Type and Btu/hr ra				
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. Natural Gas: 134,408 scf/hr (Based on 0°F); 1,115.4 MMscf/yr (Based on 32°F)					
Describe each fuel expected to be used during the term of the permit.					
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value		
Natural Gas	0.25 grains/100 scf	0	1,020 Btu/scf		
	9.				

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	7.53	46.62
Nitrogen Oxides (NO _X)	7.42	31.24
Lead (Pb)	-	-
Particulate Matter (PM _{2.5})	0.90	3.75
Particulate Matter (PM ₁₀)	0.90	3.75
Total Particulate Matter (TSP)	0.90	3.75
Sulfur Dioxide (SO ₂)	7.83	0.41
Volatile Organic Compounds (VOC)	0.86	3.75
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.10	0.40
Total HAPs	0.14	0.58
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	РРН	TPY
CO2e	16,054	66,609

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

NOx, VOC, and CO: Vendor Data (20% of UHC for VOC)

CO2e: 40 CFR 98 Subpart C

PM2.5/PM10/TSP: AP-42 Table 3.1-2a (4/00)

SO2: 0.20 grains S/100 scf (hourly); 0.25 grains S/100 scf (annually)

HAPs: AP-42 Table 3.1-3 (4/00)

Applicable Requirements			
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.			
 40 CFR 60 Subpart KKKK, §60.4305(a) – Subject to this subpart since the turbine has a heat input >= 10 MMBtu/hr. R13-3254A Condition 4.1.1.a.i,ii,iv: Annual emission limits (tpy): NOx – 32.82, CO – 48.4, VOC – 3.73 R13-3254A Condition 4.1.1.a.i: NOx limited to 25 ppm at 15% O2 or 150 ng/J of useful output (1.2 lb/MWh). When operating at less than 75% peak load or at temperatures less than 0 °F, the limit for NOx is 150 ppm at 15% O2 or 1,100 ng/J of useful output (8.7 lb/MWh). [40 CFR §60.4320] R13-3254A Condition 4.1.1.a.iii: SO2 limited to 0.060 lb of SO2/MMBtu heat input. [40 CFR §60.4330(a)(2)] 			
Permit Shield			
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)			
(1) R13-3254A Condition 4.5.1: Submit an initial notification within 15 days after start-up. [40 CFR §60.7(a)(3)]			
(2) R13-3254A Conditions 4.2.1, 4.4.4: Maintain records of the monthly operating hours for normal, low-load, low-temperature, and startup/shutdown operation. Calculate monthly emissions and keep in a rolling 12-month format.			
(2),(3) R13-3254A Conditions 4.3.1: Conduct an initial performance test for NOx within 60 days after achieving maximum output of the turbine, but no later than 180 days after initial startup. Conduct subsequent performance tests annually. This frequency can be reduced to every two years if the results demonstrate the turbine achieved compliance of <= 75% of the NOx emission limit. Maintain records of performance tests. Submit copy of performance test within 60 days of test completion. [40 CFR §60.8, §60.4340(a), §60.4375(b), §60.4400]			
(4) R13-3254A Condition 4.4.5: Maintain the fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract specifying that the maximum total sulfur content for natural gas is 20 grains of sulfur or less per 100 scf. [40 CFR §60.4365(a)]			

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form					
Emission Unit Description					
Emission unit ID number:	Emission unit name:	List any control dewith this emission u			
T03	Turbine #3	dry-low-NOx (SoLo			
		ary low from (Sobo			
Provide a description of the emission Natural gas-fired Solar Mars 100 Turb		esign parameters, etc	.):		
Manufacturer: Solar	Model number: Mars 100-16000S	Serial number:			
Construction date: 1/3/2018 (In service)	Installation date: 1/3/2018 (In service)	Modification date(s N/A):		
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 15,339 HP @ 32°F					
Maximum Hourly Throughput: 134,408 scf/hr (Based on 0°F)	Maximum Annual Throughput: 1,115.4 MMscf/yr (Based on 32°F)	Maximum Operation 8,760 hr/yr	ng Schedule:		
Fuel Usage Data (fill out all applical	ole fields)	·			
Does this emission unit combust fue	this emission unit combust fuel? Yes X No If yes, is it?				
	^	Indirect Fired	Direct Fired		
Maximum design heat input and/or maximum horsepower rating: Max Heat Input: 137.10 MMBtu/hr (HHV, 0 °F) 15,339 HP @ 32°F		Type and Btu/hr rating of burners:			
List the primary fuel type(s) and if a the maximum hourly and annual fue Natural Gas: 134,408 scf/hr (Based on	el usage for each.		listed, provide		
Describe each fuel expected to be us	ed during the term of the permit.				
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value		
Natural Gas	0.25 grains/100 scf	0	1,020 Btu/scf		

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	7.53	46.62
Nitrogen Oxides (NO _X)	7.42	31.24
Lead (Pb)	-	-
Particulate Matter (PM _{2.5})	0.90	3.75
Particulate Matter (PM ₁₀)	0.90	3.75
Total Particulate Matter (TSP)	0.90	3.75
Sulfur Dioxide (SO ₂)	7.83	0.41
Volatile Organic Compounds (VOC)	0.86	3.75
Hazardous Air Pollutants	Potential Emissions	
	РРН	TPY
Formaldehyde	0.10	0.40
Total HAPs	0.14	0.58
Regulated Pollutants other than	Potential Emissions	
Criteria and HAP	PPH	TPY
CO2e	16,054	66,609

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

NOx, VOC, and CO: Vendor Data (20% of UHC for VOC)

CO2e: 40 CFR 98 Subpart C

PM2.5/PM10/TSP: AP-42 Table 3.1-2a (4/00)

SO2: 0.20 grains S/100 scf (hourly); 0.25 grains S/100 scf (annually)

HAPs: AP-42 Table 3.1-3 (4/00)

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(1) 40 CFR 60 Subpart KKKK, §60.4305(a) – Subject to this subpart since the turbine has a heat input >= 10 MMBtu/hr.
 (2) R13-3254A Condition 4.1.1.a.i,ii,iv: Annual emission limits (tpy): NOx – 32.82, CO – 48.4, VOC – 3.73 (3) R13-3254A Condition 4.1.1.a.i: NOx limited to 25 ppm at 15% O2 or 150 ng/J of useful output (1.2 lb/MWh). When operating at less than 75% peak load or at temperatures less than 0 °F, the limit for NOx is 150 ppm at 15% O2 or 1,100 ng/J of useful output (8.7 lb/MWh). [40 CFR §60.4320] (4) R13-3254A Condition 4.1.1.a.iii: SO2 limited to 0.060 lb of SO2/MMBtu heat input. [40 CFR §60.4330(a)(2)]
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
(1) R13-3254A Condition 4.5.1: Submit an initial notification within 15 days after start-up. [40 CFR §60.7(a)(3)]
(2) R13-3254A Conditions 4.2.1, 4.4.4: Maintain records of the monthly operating hours for normal, low-load, low-temperature, and startup/shutdown operation. Calculate monthly emissions and keep in a rolling 12-month format.
(2),(3) R13-3254A Conditions 4.3.1: Conduct an initial performance test for NOx within 60 days after achieving maximum output of the turbine, but no later than 180 days after initial startup. Conduct subsequent performance tests annually. This frequency can be reduced to every two years if the results demonstrate the turbine achieved compliance of <= 75% of the NOx emission limit. Maintain records of performance tests. Submit copy of performance test within 60 days of test completion. [40 CFR §60.8, §60.4340(a), §60.4375(b), §60.4400]
(4) R13-3254A Condition 4.4.5: Maintain the fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract specifying that the maximum total sulfur content for natural gas is 20 grains of sulfur or less per 100 scf. [40 CFR §60.4365(a)]

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form			
Emission Unit Description			
Emission unit ID number:	Emission unit name: Turbine #4	List any control de with this emission	
104	Turonic #4	dry-low-NOx (SoLo	NOx)
Provide a description of the emission Natural gas-fired Solar Mars 100 Turb		⊥ esign parameters, etc	:.):
Manufacturer: Solar	Model number: Mars 100-16000S	Serial number:	
Construction date: 12/22/2017 (In service)	Installation date: 12/22/2017 (In service)	Modification date(s	s):
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 15,339 HP @ 32°F			
Maximum Hourly Throughput: 134,408 scf/hr (Based on 0°F)	Maximum Annual Throughput: 1,115.4 MMscf/yr (Based on 32°F)	Maximum Operation 8,760 hr/yr	ng Schedule:
Fuel Usage Data (fill out all applicab	ole fields)		
Does this emission unit combust fuel	?Yes _ <u>X</u> No	If yes, is it?	
		Indirect Fired	Direct Fired
Maximum design heat input and/or maximum horsepower rating: Max Heat Input: 137.10 MMBtu/hr (HHV, 0 °F) 15,339 HP @ 32°F		Type and Btu/hr ra	ting of burners:
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. Natural Gas: 134,408 scf/hr (Based on 0°F); 1,115.4 MMscf/yr (Based on 32°F)			
Describe each fuel expected to be use	ed during the term of the permit.		
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	0.25 grains/100 scf	0	1,020 Btu/scf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	РРН	TPY
Carbon Monoxide (CO)	7.53	46.62
Nitrogen Oxides (NO _X)	7.42	31.24
Lead (Pb)	-	-
Particulate Matter (PM _{2.5})	0.90	3.75
Particulate Matter (PM ₁₀)	0.90	3.75
Total Particulate Matter (TSP)	0.90	3.75
Sulfur Dioxide (SO ₂)	7.83	0.41
Volatile Organic Compounds (VOC)	0.86	3.75
Hazardous Air Pollutants	Potential Emissions	
	РРН	TPY
Formaldehyde	0.10	0.40
Total HAPs	0.14	0.58
Regulated Pollutants other than	Pote	ntial Emissions
Criteria and HAP	РРН	TPY
CO2e	16,054	66,609
	и "	

NOx, VOC, and CO: Vendor Data (20% of UHC for VOC)

CO2e: 40 CFR 98 Subpart C

PM2.5/PM10/TSP: AP-42 Table 3.1-2a (4/00)

SO2: 0.20 grains S/100 scf (hourly); 0.25 grains S/100 scf (annually)

HAPs: AP-42 Table 3.1-3 (4/00)

Applicable	e Requirements
underlyin permit con calculated	oplicable requirements for this emission unit. For each applicable requirement, include the grule/regulation citation and/or construction permit with the condition number. (Note: Title V nation numbers alone are not the underlying applicable requirements). If an emission limit is I based on the type of source and design capacity or if a standard is based on a design parameter, mation should also be included.
(2) R (3) R (1) 1. (4) R	O CFR 60 Subpart KKKK, §60.4305(a) – Subject to this subpart since the turbine has a heat input >= 10 MMBtu/hr. 13-3254A Condition 4.1.1.a.i,ii,iv: Annual emission limits (tpy): NOx – 32.82, CO – 48.4, VOC – 3.73 13-3254A Condition 4.1.1.a.i: NOx limited to 25 ppm at 15% O2 or 150 ng/J of useful output (1.2 b/MWh). When operating at less than 75% peak load or at temperatures less than 0 °F, the limit for NOx is 50 ppm at 15% O2 or 1,100 ng/J of useful output (8.7 lb/MWh). [40 CFR §60.4320] 1.13-3254A Condition 4.1.1.a.iii: SO2 limited to 0.060 lb of SO2/MMBtu heat input. [40 CFR §60.4330(a)(2)]
Peri	mit Shield
be used to or citation	plicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall demonstrate compliance. If the method is based on a permit or rule, include the condition number a. (Note: Each requirement listed above must have an associated method of demonstrating e. If there is not already a required method in place, then a method must be proposed.)
(1)	R13-3254A Condition 4.5.1: Submit an initial notification within 15 days after start-up. [40 CFR §60.7(a)(3)]
(4)	R13-3254A Conditions 4.2.1, 4.4.4: Maintain records of the monthly operating hours for normal, low-load, low-temperature, and startup/shutdown operation. Calculate monthly emissions and keep in a rolling 12-month format.) R13-3254A Conditions 4.3.1: Conduct an initial performance test for NOx within 60 days after achieving maximum output of the turbine, but no later than 180 days after initial startup. Conduct subsequent performance tests annually. This frequency can be reduced to every two years if the results demonstrate the turbine achieved compliance of <= 75% of the NOx emission limit. Maintain records of performance tests. Submit copy of performance test within 60 days of test completion. [40 CFR §60.8, §60.4340(a), §60.4375(b), §60.4400] R13-3254A Condition 4.4.5: Maintain the fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract specifying that the maximum total sulfur content for natural gas is 20 grains of sulfur or less per 100 scf. [40 CFR §60.4365(a)]

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form			
Emission Unit Description			
Emission unit ID number:	Emission unit name: Emergency Generator	List any control de with this emission	
Provide a description of the emissio Natural gas-fired Waukesha VGF-P48	n unit (type, method of operation, d GL Emergency Generator	esign parameters, etc	:.):
Manufacturer: Waukesha	Model number: VGF-P48GL	Serial number:	
Construction date: 12/20/2017 (In service)	Installation date: 12/20/2017 (In service)	Modification date(s	s):
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 1,175 HP			
Maximum Hourly Throughput: 8,908 scf/hr	Maximum Annual Throughput: 4.45 MMscf/yr	Maximum Operati 500 hr/yr	ng Schedule:
Fuel Usage Data (fill out all applicat	ole fields)		
Does this emission unit combust fue	Yes <u>X</u> No	If yes, is it? Indirect Fired	Direct Fired
Maximum design heat input and/or maximum horsepower rating: 9.09 MMBtu/hr 1,175 HP		Type and Btu/hr ra	ting of burners:
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. Natural gas: 8,908 scf/hr; 4.45 MMscf/yr			
Describe each fuel expected to be use	ed during the term of the permit.		
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	0.25 grains/100 scf	0	1,020 Btu/scf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	3.37	0.84
Nitrogen Oxides (NO _X)	5.18	1.30
Lead (Pb)	-	-
Particulate Matter (PM _{2.5})	0.09	0.02
Particulate Matter (PM ₁₀)	0.09	0.02
Total Particulate Matter (TSP)	0.09	0.02
Sulfur Dioxide (SO ₂)	0.52	1.62E-03
Volatile Organic Compounds (VOC)	0.10	0.03
Hazardous Air Pollutants	Potent	tial Emissions
	PPH	TPY
Formaldehyde	0.48	0.12
Total HAPs	0.66	0.16
Regulated Pollutants other than Criteria and HAP	Potent	tial Emissions
Choria and In i	PPH	TPY
CO2e	1,064	266
9		

NOx, CO, VOC: Vendor Data (assumed VOC = NMNEHC)

CO2e: 40 CFR 98 Subpart C

PM 2.5/PM10/TSP and HAPs: AP-42 Table 3.2-2 (7/00) - 4SLB SO2: 20 grains S/100 scf (hourly); 0.25 grains S/100 scf (annual)

Applicable Req	uirements	
underlying rul permit condition calculated base this information (1) Comp (2) R13-3 hours (3) R13-3 emissi hr or 8	ble requirements for this emission unit. For each applicable requirement, include the e/regulation citation and/or construction permit with the condition number. (Note: Title V in numbers alone are not the underlying applicable requirements). If an emission limit is ed on the type of source and design capacity or if a standard is based on a design parameter, in should also be included. You with 40 CFR 63 Subpart ZZZZ 254A Condition 4.1.3.c: Operating hours in non-emergency situations limited to a maximum of 100 per year. 254A Condition 4.1.3.a: NOx emissions shall not exceed 2.0 g/hp-hr or 160 ppmvd at 15% O2. CO cons shall not exceed 4.0 g/hp-hr or 540 ppmvd at 15% O2. VOC emissions shall not exceed 1.0 g/h 66 ppmvd at 15% O2 (excluding CH2O emissions). [40 CFR §60.4233(e), Table 1] R 60 Subpart JJJJ work practice standards)
Permit S	nield	
be used to demor citation. (N	ble requirements listed above, provide monitoring/testing/recordkeeping/reporting which shalonstrate compliance. If the method is based on a permit or rule, include the condition number ote: Each requirement listed above must have an associated method of demonstrating there is not already a required method in place, then a method must be proposed.)	ll er
NSPS (2) R13-32 for em operati (2) R13-32 (3) R13-32 8,760 I 60 day (4) R13-32	R 63 Subpart ZZZZ; §63.6590(c)(1): Comply with NESHAP Subpart ZZZZ by complying with Subpart JJJJ. 254A Condition 4.2.2: Maintain records of hours of operation including how many hours are spent ergency operation, what classified the operation as an emergency, hours spent for non-emergency on, and reason for non-emergency operation. [40 CFR §60.4245(b)] 254A Condition 4.1.3.d: Install a non-resettable hour meter. [40 CFR §60.4237(a)] 254A Condition 4.3.2: Conduct an initial performance test and subsequent performance tests every tours of operation or 3 years, whichever comes first. Submit a copy of the performance test within a after test completion. [40 CFR §60.4243(b), §60.4245(d)] 254A Condition 4.1.3.e: Keep a maintenance plan and records of conducted maintenance as well as fications submitted. [40 CFR §60.4245(a)]	

Are you in compliance with all applicable requirements for this emission unit? \underline{X} Yes $\underline{\hspace{1cm}}$ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form			
Emission Unit Description			
Emission unit ID number: HTR1	Emission unit name: Process Heater #1	List any control de with this emission None	
Provide a description of the emission Natural Gas-fired Process Heater #1	n unit (type, method of operation, de	±esign parameters, etc	c.):
Manufacturer:	Model number:	Serial number:	
Construction date: 12/20/2017 (In service)	Installation date: 12/20/2017 (In service)	Modification date(s	s):
Design Capacity (examples: furnace 0.40 MMBtu/hr	s - tons/hr, tanks - gallons):		
Maximum Hourly Throughput: 392 scf/hr	Maximum Annual Throughput: 3.44 MMscf/yr	Maximum Operati 8,760 hr/yr	ng Schedule:
Fuel Usage Data (fill out all applicat	ole fields)		
Does this emission unit combust fuel	? <u>X</u> Yes No	If yes, is it? X Indirect Fired	Direct Fired
Maximum design heat input and/or maximum horsepower rating: Max Heat Input: 0.40 MMBtu/hr		Type and Btu/hr ra	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. Natural Gas: 392 scf/hr; 3.44 MMscf/yr			
Describe each fuel expected to be use	ed during the term of the permit.		
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	0.25 grains/100 scf	0	1,020 Btu/scf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.03	0.14
Nitrogen Oxides (NO _X)	0.04	0.17
Lead (Pb)	1.96E-07	8.59E-07
Particulate Matter (PM _{2.5})	2.98E-03	0.01
Particulate Matter (PM ₁₀)	2.98E-03	0.01
Total Particulate Matter (TSP)	2.98E-03	0.01
Sulfur Dioxide (SO ₂)	0.02	1.25E-03
Volatile Organic Compounds (VOC)	2.16E-03	0.01
Hazardous Air Pollutants	Potential Emissions	
	РРН	TPY
Formaldehyde	2.94E-05	1.29E-04
Total HAPs	7.41E-04	3.24E-03
Regulated Pollutants other than	Poter	ntial Emissions
Criteria and HAP	РРН	TPY
CO2e	47	205

NOx and CO: AP-42 Table 1.4-1 (7/98)

CO2e: 40 CFR 98 Subpart C

PM 2.5/PM10/TSP, Pb, and VOC: AP-42 Table 1.4-2 (7/98) SO2: 20 grains S/100 scf (hourly); 0.25 grains S/100 scf (annual)

HAPs: AP-42 Table 1.4-3 & 4 (7/98)

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(1) R13-3254A Condition 4.1.2: Annual emission limits (tpy): NOx – 0.17; CO – 0.14
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.) (1) R13-3254A Condition 4.2.3: Maintain records of the amount of fuel consumed on a monthly basis.
Are you in compliance with all applicable requirements for this emission unit? _X_YesNo
If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form			
Emission Unit Description			
Emission unit ID number: HTR3	Emission unit name: Process Heater #3	List any control de with this emission None	evices associated unit:
Provide a description of the emission Natural Gas-fired Process Heater #3	n unit (type, method of operation, d	esign parameters, etc	e.):
Manufacturer:	Model number:	Serial number:	
Construction date: 12/20/2017 (In service)	Installation date: 12/20/2017 (In service)	Modification date(N/A	s):
Design Capacity (examples: furnace 0.40 MMBtu/hr	s - tons/hr, tanks - gallons):		
Maximum Hourly Throughput: 392 scf/hr	Maximum Annual Throughput: 3.44 MMscf/yr	Maximum Operati 8,760 hr/yr	ng Schedule:
Fuel Usage Data (fill out all applicat	ole fields)		
Does this emission unit combust fuel	? _X_Yes No	If yes, is it?	D: (F: 1
Maximum design heat input and/or maximum horsepower rating: Max Heat Input: 0.40 MMBtu/hr		X Indirect Fired Type and Btu/hr ra	
List the primary fuel type(s) and if a the maximum hourly and annual fue Natural Gas: 392 scf/hr; 3.44 MMscf/y	el usage for each.). For each fuel type	listed, provide
Describe each fuel expected to be use	ed during the term of the permit.		
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	0.25 grains/100 scf	0	1,020 Btu/scf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	РРН	TPY
Carbon Monoxide (CO)	0.03	0.14
Nitrogen Oxides (NO _X)	0.04	0.17
Lead (Pb)	1.96E-07	8.59E-07
Particulate Matter (PM _{2.5})	2.98E-03	0.01
Particulate Matter (PM ₁₀)	2.98E-03	0.01
Total Particulate Matter (TSP)	2.98E-03	0.01
Sulfur Dioxide (SO ₂)	0.02	1.25E-03
Volatile Organic Compounds (VOC)	2.16E-03	0.01
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	2.94E-05	1.29E-04
Total HAPs	7.41E-04	3.24E-03
Decrelated Delluterate ather than	D. (d'In
Regulated Pollutants other than Criteria and HAP		itial Emissions
	PPH	TPY
CO2e	47	205
198		•

NOx and CO: AP-42 Table 1.4-1 (7/98)

CO2e: 40 CFR 98 Subpart C

PM 2.5/PM10/TSP, Pb, and VOC: AP-42 Table 1.4-2 (7/98) SO2: 20 grains S/100 scf (hourly); 0.25 grains S/100 scf (annual)

HAPs: AP-42 Table 1.4-3 & 4 (7/98)

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(1) R13-3254A Condition 4.1.2: Annual emission limits (tpy): NOx – 0.17; CO – 0.14
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.) (1) R13-3254A Condition 4.2.3: Maintain records of the amount of fuel consumed on a monthly basis.
Are you in compliance with all applicable requirements for this emission unit? X Yes No
If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form						
Emission Unit Description						
Emission unit ID number: HTR2	Emission unit name: Catalytic Heaters	with this emission unit				
Provide a description of the emission 40 Natural Gas-fired Catalytic Heaters		esign parameters, etc	.):			
Manufacturer:	Model number:	Serial number:				
Construction date: 12/20/2017 (In service)	Installation date: 12/20/2017 (In service)	Modification date(s N/A	s):			
Design Capacity (examples: furnace 40 x 0.72 MMBtu/hr	s - tons/hr, tanks - gallons):					
Maximum Hourly Throughput: 2,824 scf/hr	Maximum Annual Throughput: 24.73 MMscf/yr	Maximum Operating Schedule: 8,760 hr/yr				
Fuel Usage Data (fill out all applicat	ole fields)					
Does this emission unit combust fuel? X Yes No If yes, is it?						
<u>X</u> Indirect FiredDirect Fired						
Maximum design heat input and/or maximum horsepower rating: 40 x 0.072 MMBtu/hr Type and Btu/hr rating of burners:						
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. Natural Gas: 2,824 scf/hr; 24.73 MMscf/yr						
Describe each fuel expected to be used during the term of the permit.						
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value			
Natural Gas	0.25 grains/100 scf	0	1,020 Btu/scf			

Emissions Data				
Criteria Pollutants	Potential Emissions			
	PPH	TPY		
Carbon Monoxide (CO)	0.24	1.04		
Nitrogen Oxides (NO _x)	0.28	1.24		
Lead (Pb)	1.41E-06	6.18E-06		
Particulate Matter (PM _{2.5})	0.02	0.09		
Particulate Matter (PM ₁₀)	0.02	0.09		
Total Particulate Matter (TSP)	0.02	0.09		
Sulfur Dioxide (SO ₂)	0.16	9.01E-03		
Volatile Organic Compounds (VOC)	0.02	0.07		
Hazardous Air Pollutants	Potential Emissions			
	PPH	TPY		
Formaldehyde	2.12E-04	9.28E-04		
Total HAPs	5.33E-03	0.02		
Regulated Pollutants other than	Pote	ntial Emissions		
Criteria and HAP	PPH	TPY		
CO2e	337	1,477		
·	·			

NOx and CO: AP-42 Table 1.4-1 (7/98)

CO2e: 40 CFR 98 Subpart C

PM 2.5/PM10/TSP, Pb, and VOC: AP-42 Table 1.4-2 (7/98) SO2: 20 grains S/100 scf (hourly); 0.25 grains S/100 scf (annual)

HAPs: AP-42 Table 1.4-3 & 4 (7/98)

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(1) Smoke and/or particulate matter emitted into the open air must not be greater than 10% opacity based on a six-minute block average. [45CSR§2-3.1]
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
(1) When requested, conduct Method 9 emission observations. [45CSR§2-3.2]
Are you in compliance with all applicable requirements for this emission unit? X YesNo
If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form							
Emission Unit Description							
Emission unit ID number: TK01 Provide a description of the emissio 1,000 gallon condensate (pipeline flui		List any control de with this emission i None esign parameters, etc	unit:				
Manufacturer: N/A	Model number: N/A	Serial number: N/A					
Construction date: 01/01/2018 (In service)	Installation date: 01/01/2018 (In service)	Modification date(s	s):				
Design Capacity (examples: furnace 1,000 gal	es - tons/hr, tanks - gallons):						
Maximum Hourly Throughput:	Maximum Annual Throughput: 12,000 gal (12 turnovers)	Maximum Operating Schedule: 8,760 hr/yr					
Fuel Usage Data (fill out all applical	ple fields)						
Does this emission unit combust fue	!? Yes _ <u>X</u> No	If yes, is it? Indirect Fired	Direct Fired				
Maximum design heat input and/or	maximum horsepower rating:	Type and Btu/hr ra	ting of burners:				
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.							
Describe each fuel expected to be used during the term of the permit.							
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value				

Criteria Pollutants	Potential Emissions			
	PPH	TPY		
Carbon Monoxide (CO)	-	-		
Nitrogen Oxides (NO _X)	-	-		
Lead (Pb)	-	-		
Particulate Matter (PM _{2.5})	-	-		
Particulate Matter (PM ₁₀)	-	-		
Total Particulate Matter (TSP)	-	-		
Sulfur Dioxide (SO ₂)	-	-		
Volatile Organic Compounds (VOC)	0.003	0.01		
Hazardous Air Pollutants	Potential Emissions			
	PPH	TPY		
Pagulated Pollutants other than	Detect	I Pouls d'au		
Regulated Pollutants other than Criteria and HAP		al Emissions		
	PPH	TPY		

AP-42 Chapter 7.1 equations

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(1) R13-3254A Condition 4.2.4 – 40 CFR 63.5410a(h)
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
(1) R13-3254A Condition 4.2.4 – 40 CFR 63.5410a(h) – Submit condensate production data for first 30 days in service and calculate potential VOC emissions.
·
Are you in compliance with all applicable requirements for this emission unit? Yes No
If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form							
Emission Unit Description							
Emission unit ID number: TK01A Provide a description of the emission	Emission unit name: Condensate (Pipeline Fluids) Storage Tank List any control devices associated with this emission unit: None unit (type, method of operation, design parameters, etc.):						
500 gallon condensate (pipeline fluids		,	Ź				
Manufacturer: N/A	Model number: N/A	Serial number: N/A					
Construction date: 01/01/2018 (In service)	Installation date: 01/01/2018 (In service)	Modification date(s)):				
Design Capacity (examples: furnace 500 gal	s - tons/hr, tanks - gallons):						
Maximum Hourly Throughput:	Maximum Annual Throughput: 6,000 gal (12 turnovers)	Maximum Operating Schedule: 8,760 hr/yr					
Fuel Usage Data (fill out all applicat	ole fields)	11					
Does this emission unit combust fuel?Yes _X_ No If yes, is it? Indirect Fired Direct Fired							
Maximum design heat input and/or maximum horsepower rating: Type and Btu/hr rating of burners:							
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.							
Describe each fuel expected to be used during the term of the permit.							
Fuel Type	Max. Sulfur Content Max. Ash Content B						

Criteria Pollutants	Potential Emissions			
Criteria i ondiants	PPH	TPY		
Carbon Monoxide (CO)	-			
Nitrogen Oxides (NO _X)	_	-		
Lead (Pb)	_			
Particulate Matter (PM _{2.5})				
Particulate Matter (PM ₁₀)	-			
Total Particulate Matter (TSP)	-	-		
Sulfur Dioxide (SO ₂)	-	-		
Volatile Organic Compounds (VOC)	0.001	0.006		
Hazardous Air Pollutants	Potential Emissions			
	РРН	TPY		
Regulated Pollutants other than Criteria and HAP	Potentia	Emissions		
Chieria and HAP	PPH	TPY		

AP-42 Chapter 7.1 equations

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(1) R13-3254A Condition 4.2.4 – 40 CFR 63.5410a(h)
Permit Shield
For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)
(1) R13-3254A Condition 4.2.4 – 40 CFR 63.5410a(h) – Submit condensate production data for first 30 days in service and calculate potential VOC emissions.
•
Are you in compliance with all applicable requirements for this emission unit?YesNo
If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Supplemental Attachment: Supporting Emissions Calculations

Facility Total PTE

Source		Annual Emissions (tpy)						
Source	NO _x	со	PM ₁₀ /PM _{2.5}	VOC	SO ₂	CH₂O	Total HAP	
Solar Mars 100 Turbine #1	31.24	46.62	3.75	3.75	0.41	0.40	0.58	
Solar Mars 100 Turbine #2	31.24	46.62	3.75	3.75	0.41	0.40	0.58	
Solar Mars 100 Turbine #3	31.24	46.62	3.75	3.75	0.41	0.40	0.58	
Solar Mars 100 Turbine #4	31.24	46.62	3.75	3.75	0.41	0.40	0.58	
Emergency Generator	1.30	0.84	0.02	0.03	1.62E-03	0.12	0.16	
Line Heater #1	0.17	0.14	1.31E-02	9.45E-03	1.25E-03	1.29E-04	3.24E-03	
Line Heater #3	0.17	0.14	1.31E-02	9.45E-03	1.25E-03	1.29E-04	3.24E-03	
(40) Catalytic Heaters	1.24	1.04	0.09	0.07	9.01E-03	9.28E-04	0.02	
Condensate Tank (1,000 gal)				0.01			3.18E-03	
Condensate Tank (500 gal)				5.84E-03			1.56E-03	
Equipment Leaks (fugitive emissions) ¹				0.80				
Venting				12.41				
Facility PTE ²	127.83	188.64	15.16	27.55	1.64	1.74	2.54	
Title V Threshold	100	100	100	100	100	10	25	
PSD Applicability Threshold	250	250	250	250	250			

^{1.} Fugitive emissions are not part of the PSD or Title V applicability analyses.

^{2.} Excludes fugitive emissions (compressor stations are not one of the named source categories that include fugitive emissions).

Solar Mars 100 Turbines

Horsepower 15,339 hp (32 °F)

Brake Specific Fuel Consumption 7,628 Btu/Bhp-hr (LHV, 32 °F)
Total Heat Input 117.00 MMBtu/hr (LHV, 32 °F)

129.87 MMBtu/hr (HHV, 32 °F)³

Maximum Heat Input (at 0 °F) 123.51 MMBtu/hr (LHV, 0 °F)

137.10 MMBtu/hr (HHV, 0 °F)3

Operating Hours 8,760 hr/yr
Natural Gas Heat Content 1,020 Btu/scf

Fuel Consumption 1,115.35 MMscf/yr (based on 32 °F)

134,408 scf/hr (based on 0 °F)

Quantity 4

Pollutant	Emissio	Emission Factor			Emission Rat		
Foliutant	ppmvd@15%O ₂	lb/MM	3tu	lb/hr ¹	ton/yr²	ton/yr (4 turbines)	Emission Factor Reference
NO _x	15.00	0.060	LHV	7.42	31.24	124.95	Vendor Data
co	25.00	0.061	LHV	7.53	46.62	186.47	Vendor Data
PM ₁₀		0.0066	HHV	0.90	3.75	15.02	AP-42 Table 3.1-2a (4/00)
PM _{2.5}		0.0066	HHV	0.90	3.75	15.02	AP-42 Table 3.1-2a (4/00)
VOC	5.00	0.007	LHV	0.86	3.75	15.01	Vendor Data (20% of UHC)4
SO ₂ (Maximum Hourly)		0.0571	HHV	7.83			20 grains S / 100 scf
SO ₂ (Average Annual)		0.000714	HHV		0.41	1.62	0.25 grains S / 100 scf
Formaldehyde		0.00071	HHV	0.10	0.40	1.62	AP-42 Table 3.1-3 (4/00)
Total HAPs		0.00103	HHV	0.14	0.58	2.34	AP-42 Table 3.1-3 (4/00)

- 1. Maximum hourly emission rate based on 0 °F.
- 2. Annual emission rate based on combination of potential operating modes as provided on following page for NOx, CO, and VOC. All other pollutants based on horsepower and brake specific fuel consumption.
- 3. HHV heat input based on HHV=1.11*LHV
- 4. VOC based on 20% of vendor data for unburned hydrocarbon (UHC).

Solar Mars 100 - Vendor Supplied Emission Rates

Operating Mode	Units	NO _x	CO	VOC
Normal Load @ 32 °F1	lb/hr	7.02	7.12	0.82
Low Temp (<0 to -20 °F) ²	lb/hr	21.33	30.91	1.77
Very Low Temp (<-20 °F) ²	lb/hr	60.93	46.36	1.77
Low-Load (<50%) ³	lb/hr	16.10	653.41	7.47
Startup/ Shutdown ⁴	lb/event	3.10	272.7	3.12

- 1. Based on data from Solar Mars 100 Compressor Set data sheet and the following concentrations: 15 ppm NOx; 25 ppm CO; 5 ppm VOC
- 2. Based on data from Solar Product Information Letter (PIL) 167
- 3. Based on data provided by Solar for 40% load
- 4. Based on data from Solar PIL170

Potential Annual Emissions Per Turbine

	Operati	ng Time	NO _x	co	voc
Operating Mode	Cycles	hr/yr	ton/yr	ton/yr	ton/yr
Normal Load @ 32 °F	MAR AND	8668	30.43	30.86	3.54
Low Temp (<0 to -20 °F)		50	0.53	0.77	0.04
Very Low Temp (<-20 °F)	IN EDITO	0	0.00	0.00	0.00
Low-Load (<50%)		25	0.20	8.17	0.09
Startup/ Shutdown	50	17	0.08	6.82	0.08
Total		8,760	31.24	46.62	3.75

Fugitive Emissions from Leaks

Number of Compressors:

4

Annual Operating Hours:

8,760

	Average Number of		Т	otal Emissic	mpressors	5)	
	Leaking Components ¹	Emission Factor ²	Total	CH ₄ ³	CH₄ ⁴	CH₄	VOC ⁵
	component leaks /						
Component	compressor	scf/hr / component	scf/hr	scf/hr	lb/hr	ton/yr	ton/yr
Compressor Service							
Valve	0.55	14.84	32.65	30.44	1.29	5.64	2.18E-01
Connector	0.62	5.59	13.86	12.93	0.55	2.40	9.27E-02
Open-Ended Line	0.16	17.27	11.05	10.31	0.44	1.91	7.39E-02
Pressure Relief Valve	0.00	39.66	0.00	0.00	0.00	0.00	0.00E+00
Meter	0.00	19.33	0.00	0.00	0.00	0.00	0.00E+00
Non-Compressor Service							
Valve	0.60	6.42	15.41	14.37	0.61	2.66	1.03E-01
Connector	0.82	5.71	18.73	17.46	0.74	3.24	1.25E-01
Open-Ended Line	0.59	11.27	26.60	24.80	1.05	4.60	1.78E-01
Pressure Relief Valve	0.12	2.01	0.96	0.90	0.04	0.17	6.45E-03
Meter	0.01	2.93	0.12	0.11	0.00	0.02	7.83E-04
					Total:	20.64	0.80

- 1. Estimated component leaks per compressor based on average measurements throughout the Columbia pipeline system. Actual leaks found during quarterly surveys are as follows: 4Q17 1, 1Q18 2, 2Q18 2, 3Q18 4, 4Q18 14
- 2. Emission factors from 40 CFR 98 Subpart W Table W-3
- 3. CH_4 emission rates based on 93.25 vol% CH_4 in natural gas
- 4. Conversion based on densities of GHG as provided in 40 CFR 98.233(v)
- 5. Based on a 0.039 ratio of VOC to methane as calculated from gas composition.

Solar Mars 100 - Emissions from Venting

Number of Pneumatic Actuators: 7 per turbine
Pneumatic Actuator Vent Rate: 3 scf/hr/actuator

Number of Turbines 4

Number of Startup/Shutdown Cycles: 50 per turbine per year

Electric Starter Emissions per Startup: 0 scf Blowdown Emissions per Shutdown: 67,126 scf

Number of Dry Seals:

Dry Seal Vent Rate:

2 per turbine

0.5 scf/min/seal

Annual Operating Hours: 8760

	Emission Rate						
Component	Total	CH ₄ ²	CH ₄ ³	CH₄	VOC ⁵		
Continuous During Operation	scf/hr	scf/hr	lb/hr	ton/yr	ton/yr		
Pneumatic Actuator (Total for number of units)	84.00	78.33	3.32	14.52	0.56		
Dry Seals (Total for number of units)	240.00	223.80	9.47	41.49	1.60		
Intermittent During Startup/Shutdown	scf/event	scf/event	lb/event	ton/yr	ton/yr		
Electric Starter (Total for number of units) ¹	0	0	0	0	0.00		
Blowdowns (Total for number of units) ^{1,4}	67,126	62,595	2,650	265	10.24		
				Total:	12.41		

- 1. Emission rates per event instead of per hour
- 2. CH₄ emission rates based on 93.25 vol% CH₄ in natural gas
- 3. Conversion based on densities of GHG as provided in 40 CFR 98.233(v)
- 4. Conservative estimate based on 1 blowdown per shutdown. It is not expected that a blowdown will occur after
- 5. Based on a 0.039 ratio of VOC to methane as calculated from gas composition

Waukesha Emergency Generator

Horsepower 1,175 hp

Brake Specific Fuel Consumption 7,733 Btu/Bhp-hr
Total Heat Input 9.09 MMBtu/hr
Operating Hours 500 hr/yr
Natural Gas Heat Content 1,020 Btu/scf
Fuel Consumption 4.45 MMscf/yr

8,908 scf/hr

Pollutant	Emissio	n Factor	Emiss	ion Rate ¹	
Fonutant	g/bhp-hr	lb/MMBtu	lb/hr	ton/yr	Emission Factor Reference
NO _x	2.00		5.18	1.30	Vendor Data
СО	1.30		3.37	0.84	Vendor Data
PM ₁₀		0.010	0.09	0.02	AP-42 Table 3.2-2 (7/00) - 4SLB
PM _{2.5}		0.010	0.09	0.02	AP-42 Table 3.2-2 (7/00) - 4SLB
VOC	0.04		0.10	0.03	Vendor Data
SO ₂ (Maximum Hourly)		0.0571	0.52		20 grains S / 100 scf
SO ₂ (Average Annual)		0.000714		1.62E-03	0.25 grains S / 100 scf
Formaldehyde		0.05280	0.48	0.12	AP-42 Table 3.2-2 (7/00) - 4SLB
Total HAPs		0.07220	0.66	0.16	AP-42 Table 3.2-2 (7/00) - 4SLB

^{1.} Emissions based on reference provided assuming operation at maximum capacity for 500 hours per year.

Indirect-fired Heat Exchanger #1 - H1

Heat Input

0.40 MMBtu/hr

Operating Hours

8,760 hr/yr

Natural Gas Heat Content

1,020 Btu/scf

Fuel Consumption

3.44 MMscf/yr

392 scf/hr

Pollutant	Emissio	n Factor	r Emission Rate ¹		Facination Footon Defense	
Politicant	lb/MMscf	lb/MMBtu	lb/hr	ton/yr	Emission Factor Reference	
NO _x	100	0.098	0.04	0.17	AP-42 Table 1.4-1 (7/98)	
со	84	0.082	0.03	0.14	AP-42 Table 1.4-1 (7/98)	
PM ₁₀	7.6	0.007	2.98E-03	1.31E-02	AP-42 Table 1.4-2 (7/98)	
PM _{2.5}	7.6	0.007	2.98E-03	1.31E-02	AP-42 Table 1.4-2 (7/98)	
VOC	5.5	0.005	2.16E-03	9.45E-03	AP-42 Table 1.4-2 (7/98)	
SO ₂ (Maximum Hourly)		0.0571	0.02		20 grains S / 100 scf	
SO ₂ (Average Annual)		0.000714		1.25E-03	0.25 grains S / 100 scf	
Formaldehyde	0.075	0.00007	2.94E-05	1.29E-04	AP-42 Table 1.4-3 (7/98)	
Total HAPs	1.89	0.00185	7.41E-04	3.24E-03	AP-42 Table 1.4-3 & 4 (7/98)	

^{1.} Emissions based on reference provided assuming operation at maximum capacity for 8,760 hours per year.

Indirect-fired Heat Exchanger #3 - H3

Heat Input 0.40 MMBtu/hr

Operating Hours 8,760 hr/yr
Natural Gas Heat Content 1,020 Btu/scf
Fuel Consumption 3.44 MMscf/yr

392 scf/hr

Pollutant	Emissio	Emission Factor		Emission Rate ¹	Emission Foot - B. C
Politicalit	lb/MMscf	lb/MMBtu	lb/hr	ton/yr	Emission Factor Reference
NO _x	100	0.098	0.04	0.17	AP-42 Table 1.4-1 (7/98)
СО	84	0.082	0.03	0.14	AP-42 Table 1.4-1 (7/98)
PM ₁₀	7.6	0.007	2.98E-03	1.31E-02	AP-42 Table 1.4-2 (7/98)
PM _{2.5}	7.6	0.007	2.98E-03	1.31E-02	AP-42 Table 1.4-2 (7/98)
VOC	5.5	0.005	2.16E-03	9.45E-03	AP-42 Table 1.4-2 (7/98)
SO ₂ (Maximum Hourly)		0.0571	0.02		20 grains S / 100 scf
SO ₂ (Average Annual)		0.000714		1.25E-03	0.25 grains S / 100 scf
Formaldehyde	0.075	0.00007	2.94E-05	1.29E-04	AP-42 Table 1.4-3 (7/98)
Total HAPs	1.89	0.00185	7.41E-04	3.24E-03	AP-42 Table 1.4-3 & 4 (7/98)

^{1.} Emissions based on reference provided assuming operation at maximum capacity for 8,760 hours per year.

Catalytic Space Heaters

Heat Input 0.072 MMBtu/hr

Quantity 40

Total Heat Input 2.88 MMBtu/hr
Operating Hours 8,760 hr/yr
Natural Gas Heat Content 1,020 Btu/scf
Fuel Consumption 24.73 MMscf/yr

2,824 scf/hr

Pollutant	Emissio	Emission Factor		on Rate ¹	Eminalas Esatas Datas
rondtant	lb/MMscf	lb/MMBtu	lb/hr (40 heaters)	ton/yr	Emission Factor Reference
NO _x	100	0.098	0.28	1.24	AP-42 Table 1.4-1 (7/98)
со	84	0.082	0.24	1.04	AP-42 Table 1.4-1 (7/98)
PM ₁₀	7.6	0.007	0.02	0.09	AP-42 Table 1.4-2 (7/98)
PM _{2.5}	7.6	0.007	0.02	0.09	AP-42 Table 1.4-2 (7/98)
voc	5.5	0.005	0.02	0.07	AP-42 Table 1.4-2 (7/98)
SO ₂ (Maximum Hourly)		0.0571	0.16		20 grains S / 100 scf
SO ₂ (Average Annual)		0.000714	1	0.01	0.25 grains S / 100 scf
Formaldehyde	0.075	0.00007	2.12E-04	9.28E-04	AP-42 Table 1.4-3 (7/98)
Total HAPs	1.89	0.00185	5.33E-03	0.02	AP-42 Table 1.4-3 & 4 (7/98)

^{1.} Emissions based on reference provided assuming operation at maximum capacity for 8,760 hours per year.

Supplemental Attachment:

Executive Summary

Executive Summary

Columbia Gas Transmission, LLC's Lone Oak Compressor Station, located in Marshall County, West Virginia is a typical natural gas compressor station which was issued Permit to Construct R13-3254 on December 7, 2015. A Class I Administrative Update was issued for the Station on December 12, 2017.

Natural gas is received from upstream compressor stations via pipelines and compressed using four (4) Solar turbine-driven compressors for transmission to a downstream station. Auxiliary equipment permitted at the station includes one (1) natural gas-fired emergency generator, two (2) process heaters, forty (40) catalytic heaters, and numerous insignificant storage tanks including two condensate storage tanks.

Per 45CFR30-4.1.a.2, a Title V application for the Station is due within 12 months after the date of commencement of operation authorized by the permit to construct. The in-service dates for the emission units at the Station are as follows:

Emission Unit ID	Unit Description	In Service Date	
T01	Solar Mars 100 Turbine #1	12/22/2017	
T02	Solar Mars 100 Turbine #2	8/22/2018	
T03	Solar Mars 100 Turbine #3	1/3/2018	
T04	Solar Mars 100 Turbine #4	12/22/2017	
HTR1	Process Heater #1	12/20/2017	
HTR3	Process Heater #3	12/20/2017	
SH1	Comfort Heaters	12/20/2017	
G1	Emergency Generator #1	12/20/2017	
TK01	Condensate Storage Tank	1/1/2018	
TK02	Condensate Storage Tank	1/1/2018	

As described in the R13 permit application for the Station, the following federal regulations are applicable to these emission units:

- 40 CFR 60 Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) applies to G1.
- 40 CFR 60 Subpart KKKK (Standards of Performance for Stationary Combustion Turbines) applies to T01, T02, T03, and T04.
- 40 CFR 60 Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After September 18, 2015). This regulation is not applicable to TK01 and TK02 because potential emissions from TK01 and TK02 do not exceed 6 tons per year.
- 40 CFR 63 Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) applies to G1. G1 complies with this regulation by complying with 40 CFR 60 Subpart JJJJ.